

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
*Newport News Division*

THOMAS W. REYNOLDS,

Plaintiff,

v.

Civil Action No.: 4:21cv41

MEN'S WELLNESS CENTERS, LLC

and

MARCUS HOWERTON,

Defendants.

**JOINT MOTION IN SUPPORT OF COURT APPROVAL  
OF SETTLEMENT OF FAIR LABOR STANDARDS ACT CLAIM**

Plaintiff, Thomas W. Reynolds ("Reynolds"), and Defendants, Men's Wellness Centers, LLC ("MWC") and Marcus Howerton, submit jointly move the court to approve the Joint Stipulation of Dismissal with prejudice (ECF 11) and this Joint Motion for Court Approval of Settlement of Fair Labor Standards Act Claim for the reasons stated in their joint memorandum filed herewith.

WHEREFORE, the Plaintiff, Thomas W. Reynolds, and Defendants, Men's Wellness Centers, LLC and Marcus Howerton request that the Court approve the Settlement Agreement and dismiss this claim with prejudice; a proposed order is attached to the memorandum in support for the Court's consideration.

Respectfully submitted this 14th day of September 2021.

**MEN'S WELLNESS CENTERS, LLC AND MARCUS  
HOWERTON**

By: /s/ Adam M. Carroll

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**THOMAS W. REYNOLDS**

/s/ Christopher Colt North

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*Counsel for the Plaintiff.*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 14, 2021 a true copy of the foregoing was filed on the ECF electronic filing system which will send a Notification of Electronic Filing to all parties registered for such service and a copy by U.S. Mail, and email where indicated, to all other parties that are not so registered.

/s/ Adam M. Carroll  
Adam M. Carroll, Esq.